

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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IN RE: VALSARTAN PRODUCTS	:	HON. ROBERT B. KUGLER
LIABILITY LITIGATION	:	
	:	Civil No. 1:19-md-2875 (RBK/JS)
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**NOTICE OF EX PARTE SUBMISSION OF DEFENDANTS' POSITION STATEMENT**

Pursuant to Case Management Order No. 1, Defendants, through the undersigned counsel, on March 20, 2019, jointly submitted the Ex Parte Position Statement of Defendants, which was delivered to the Court via hand delivery.

Dated: March 21, 2019

Submitted,

<p><u>/s/ Seth A. Goldberg</u>            Seth A. Goldberg            DUANE MORRIS LLP            30 South 17<sup>th</sup> Street            Philadelphia, PA 19103-4196            Phone: (215) 979-1175  <a href="mailto:sagoldberg@duanemorris.com">sagoldberg@duanemorris.com</a></p>	<p><u>/s/ Lori G. Cohen</u>            Lori G. Cohen            GREENBERG TRAURIG LLP            Terminus 200            3333 Piedmont Road, NE, Suite 2500            Atlanta, GA 30305            Phone: (678) 553-2385  <a href="mailto:cohenl@gtlaw.com">cohenl@gtlaw.com</a></p>
<p><u>/s/ Clem C. Trischler</u>            Clem C. Trischler            PIETRAGALLO GORDON ALFANO BOSICK &amp;            RASPANTI, LLP            38<sup>th</sup> Floor, One Oxford Centre            301 Grant Street            Pittsburgh, PA 15219            Phone: (412) 263-1816  <a href="mailto:cct@pietragallo.com">cct@pietragallo.com</a></p>	<p><u>/s/ Richard W. Smith</u>            Richard W. Smith            WILEY REIN LLP            1776 K Street N.W.            Washington, DC 20006            Phone: (202) 719-7468  <a href="mailto:rwsmit@wileyrein.com">rwsmit@wileyrein.com</a></p>

**CERTIFICATE OF SERVICE**

I, Seth A. Goldberg, certify that a true and correct copy of the foregoing was served this 21<sup>st</sup> day of March, 2019, on all counsel of record via the CM/ECF system of the United States District Court for the District of New Jersey.

/s/ Seth A. Goldberg